

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

IN RE: ANNUAL REVIEW OF BASE)
 RATES FOR FUEL COSTS OF)
 DUKE ENERGY CAROLINAS,)
 LLC)

DOCKET NO. 2019-3-E

**South Carolina Coastal Conservation League and Southern Alliance for Clean Energy's
First Request for Production of Documents to Duke Energy Carolinas, LLC**

Pursuant to S.C. Code Ann. Regs. 103-833 and the South Carolina Rules of Civil Procedure, the South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy (collectively, "CCL/SACE"), by and through its undersigned counsel, hereby request that Duke Energy Carolinas, LLC ("DEC") respond to this First Request for Production of Documents separately and fully, under oath, and in writing within twenty (20) days of the date of service hereof to the offices of William C. Cleveland, Southern Environmental Law Center, 463 King Street, Suite B, Charleston, SC 29403.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information shall be provided to the undersigned in the format as requested.
2. That all responses to the below First Request for Production of Documents shall be labeled using the same numbers as used herein.
3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to the Interrogatories in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

5. That all exhibits be reduced to an 8.5" x 11" format.

6. That each Request for Production of Documents be reproduced at the beginning of the response thereto.

7. That, in addition to the signature and verification at the close of DEC's responses, DEC's witness(es) responsible for the information contained in each response be also indicated.

8. That DEC provide the undersigned with responses to the Request for Production of Documents as soon as possible but not later than twenty (20) days from the date of service hereof.

9. If the response to any Request for Production of Documents is that the information requested is not currently available, state when the information requested will become available.

10. These Requests for Production of Documents shall be deemed continuing so as to require DEC to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

11. If a privilege not to answer an interrogatory is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

12. If a refusal to answer a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.

13. Answer each Request for Production of Documents on the basis of the entire knowledge of DEC, including information in the possession of DEC, its officers, directors, consultants, representatives, agents, experts, and attorneys, if any.

14. If any Request for Production of Documents cannot be answered in full, answer to the extent possible and specify the reasons for DEC's inability to answer.

DEFINITIONS

1. The terms “DEC,” “the Company,” “You,” and “Your” where used in these Interrogatories and Requests for Production of Documents refers to Duke Energy Carolinas, LLC, together with its employees, agents, consultants, experts, subsidiaries, affiliates, and other operational or functional units and all officers, directors, owners, members, employees, agents and representatives of these entities. It also includes all other persons acting on behalf of Duke Energy Carolinas, LLC.

2. “Document” and “documents” shall mean all written, recorded or graphic matters whatsoever and all non-identical copies thereof, including but not limited to papers, work papers, books, records, letters, photographs, correspondence, communications, electronic mail, telegrams, cables, telex messages, evidences of payment, checks, memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings of telephone or other conversations, statements, summaries, opinions, studies, analyses, evaluations, contracts, agreements, jotting, agendas, bulletins, notices, announcements, advertisements, guidelines, charts, manuals, brochures, publications, schedules, price lists, subscription lists, customer lists, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, newsletters, drafts, proofs, galleys, or other prepublication forms of materials, telephone lists or indexes, rolodexes, computer printouts, data processing program libraries, data processing input and outputs, microfilm, microfiches, CD ROMs, books of account, records or invoices reflecting business operations, all records kept by electronic, photographic or mechanical means, any notes or drafts relating to any of the foregoing, and any other documents as defined in Rule 34 of the South Carolina Rules of Procedure of any kind in your possession, custody or control or to which you have access or know to exist.

3. “Relate,” “relating,” “relating to,” and “related to” when used in these Interrogatories shall mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the interrogatory, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

4. “Identify” or “identity” used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the time in question. If the person was an officer, director, trustee, commissioner, or employee of DEC, also state the job title and areas of responsibility.

5. “Identify” or “identity” used with reference to a writing means to state the date, author, type of document (*e.g.*, letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in DEC’s possession or subject to its control, state what disposition was made of it.

6. “Address” means home address, mailing address, school address, and business address.

7. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of these Interrogatories any information which might otherwise be construed outside their scope.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please provide copies of any responses to data requests by any other parties in this docket. Where available, please provide copies electronically in the native file format.
2. Based upon forecasted load projections, please provide duration curves for annual forecasted megawatt-hour per day production alongside gas consumption (in dekatherms per day) for the forecast period.
3. Please provide the Company's near- and long-term natural gas consumption forecasts, as well as any of the inputs and worksheets not explicitly stated in the forecasts.
4. Please provide projected annual fuel consumption, and heat rate and megawatts of capacity for each of the Company's gas-fired units, as well as for each unit that has been converted to dual-fuel technology that enables it to burn coal, gas or a mixture of gas and coal.
5. Identify all natural gas pipeline transportation capacity contracts (intrastate and interstate) held by the Company for the current period. For each contract, please provide the following:
 - a. Signing parties
 - b. Pipeline name
 - c. Contract ID
 - d. Type of contract
 - e. Daily entitlement
 - f. Primary receipt location(s)
 - g. Primary delivery location(s)
 - h. Market area(s)/Zones covered by primary path
 - i. Current term
 - j. Expiration date
 - k. Price (the actual prices, not just whether the price is a tariff rate or a negotiated rate and please separate reservation rate (daily) from usage rate)
 - l. Power plant(s) served

6. Please provide the Company's MW production and fuel use by hour by day for each of the Company's generating facilities capable of using gas for the current period and for gas used, please include the pipeline and Contract ID(s) used to deliver such gas.
7. Please provide copies of any precedent agreements for natural gas transportation services entered into by DEC or by any of its affiliates on behalf of DEC, any amendments thereto, and any negotiated rates (and please separate reservation rate (daily) from usage rate)

July 9, 2019

Respectfully submitted,



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